



APR 15 2024

United States District Court  
AT SEATTLE  
CLERK U.S. DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
BY DEPUTY  
Court Western District Washington

United States of America

v

Michael A. Woods

The Honorable

John C. Coughanour

No. CR20-0092-JCC-W

Motion to Appoint

Counsel

Your Honor I'm praying you will grant my motion to Appoint counsel. This case has merit with the likelihood to succeed *Carmona v U.S. Bureau of Prisons* 243 F.3d 629 632 (2d Cir 2001) The fact the warden has "Approved" my compassionate release shows my motion has merit. I am pending transfer where it takes months to receive property that contains all my legal material & discovery needed to effectively file my supplemental response *Tucker v Randall* 948 F.2d 388 391-92 (7th Cir 1991) where counsel was appointed because transfer impeded the litigant's ability to access discovery. My disabilities pose difficulty in writing filing & investigating information needed to file my response. & if transferred I will lose the help from the inmates who have been helping me. I will need expert opinion *Grano v Daly* 414 F.3d 645 658 (7th Cir 2009) where an expert opinion was needed to assess the extent of damage as a result of untimely & inadequate medical

⑤ The medical complexity is where it seems my motion is being based off the BOP ability to provide future care not the "fact" that it's based off the pain suffering & disabilities that I'm unexpected to recover from because of the ultimately inadequate care over the last 3 yrs in BOP custody. This is also a fact admitted by the BOP own clinical director DR Parker who stated all these current conditions are directly related to the injuries sustained during arrest in June 2021 "As I have claimed"

These are all grounds to support appointing counsel. I believe that it would make sense to appoint

Jason Saunders

1000 Second Ave Suite 3140

Seattle WA 98104

206 332 1280

who is already representing me in another motion regarding this case, it is up to speed & familiar with my case & this motion & willing to represent me. This would lessen any strain on the courts & tax payers

Thank you your Honor  
Michael Wood



4-4-24

Name: Michael Wood  
Reg#: 5250 086  
Federal Correctional Institution #1  
P.O. BOX 3725  
ADELANTO, CA 92301

SN BERNARDINO CA 923  
12 APR 2024 PM 4 L



APR 15 2024

AT SEATTLE  
CLERK U.S. DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
BY DEPUTY

LETTER

US DIST COURT  
CLARK OF COURT  
700 STAVERT ST # 2310  
SEATTLE WA 98101

98101-444265

